

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

QOTD FILM INVESTMENT LTD.,  
Plaintiff,  
v.  
BRIAN WILSON, an individual,  
Defendant.

Civil Action No. 16-cv-0371RSL

SECOND DECLARATION OF GREGORY  
MCLACHLAN IN OPPOSITION TO  
MOTION FOR SUMMARY JUDGMENT  
DUE TO LACK OF STANDING

I, Gregory McLachlan, declare as follows:

1. I am a principal with Benayora Pictures, a primary production company associated with Plaintiff QOTD Film Investment Ltd. I make this declaration on personal knowledge, and documents referenced herein are true and accurate copies.

2. On April 14, 2017, Ragen Amin at RMR Partnership LLP sent me documentation which required Mr. Michael Benaroya's signature in order to reinstate QOTD Film Investment Ltd. Mr. Benaroya signed the necessary documents and I subsequently sent them to Ragen Amin.

3. At this juncture, there are no other actions Benaroya Pictures or QOTD Film Investment Ltd. need to take to obtain re-instatement. Ragen Amin advised that Companies House will likely take approximately 2 weeks to re-instate QOTD Film Investment Ltd. on the paperwork is submitted.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED April 23, 2018.



Gregory McLachlan

SECOND DECLARATION OF GREGORY  
MCLACHLAN  
Civil Action No. 16-cv-0371RSL  
INIP-6-0031P70 2ndDEC\_GM

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served to all counsel or parties of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

s/ David A. Lowe

SECOND DECLARATION OF GREGORY  
MCLACHLAN  
Civil Action No. 16-cv-0371RSL  
INIP-6-0031P70 2ndDEC\_GM